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UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA

CHARLES O. BRADLEY TRUST, et al,

Plaintiffs,

Vs.

ZENITH CAPITAL LLC; et al,

Defendants.

Defendants.

The parties to this action stipulate to a limited reopening of discovery as described herein and request the court to enter an order thereon.

- 1. Plaintiffs request that each named defendant produce the following documents;
- A. Westamerica Bank records (defined as monthly statements, front and rear of canceled checks, deposit slips with all attachments) for account numbers 0404147266 (Zenith Investors One), 040414709 (COM 2001), and 0404145997 (Tristrata Group).
- B. All financial statements (defined as balance sheets, profit or loss statements, cash flow statements, retained earnings statements) of TriStrata Inc. and COM2001.
- 2. Each named defendant shall produce each responsive document in its possession no later than 30 days following filing of this stipulation and order signed by the court.

1	3. After production of the Westamerica Bank records identified in paragraph 1 by
2	defendants, plaintiffs may then serve upon Westamerica Bank a subpoena for production of
3	any documents in the described records which have been lost, destroyed, or are otherwise
4	unavailable to defendants for any reason.
5	4. All records acquired by plaintiffs pursuant to this stipulation and order may be
6	used, and are subject to, the same rules as all other discovery in this action, pursuant to the
7	Federal Rules of Civil Procedure, including the duty of "continuing discovery".
8	5. All records produced pursuant to this stipulation and order, including all documents
9	produced pursuant to any subpoena, are deemed to be confidential and are subject to the
10	stipulation and order to protect the confidentiality of documents signed by the court on April
11	7, 2006.
12	Dated: July 14, 2007 JOHNSON & MISKEL
13	Ob cont William
14	Gerald L. Williams Attorneys for Plaintiffs
15	CHARLES O. BRADLEY TRUST, et al.
16	Dated: July 19, 2007 Bacalski & Ottoson, LLP
17	/s/
18	Douglas A. Dube Attorneys for ZENITH, Tasker, Cooper, Smith,
19	Chiao Smith
20	Dated: July 19, 2007 /s/
21	Rick Tasker, Defendant In Propria Persona
22	
23	IT IS SO ORDERED. July 23, 2007
24	Dated:
25	Edward M. Chen United IT IS SO ORDERED
26	
27	Judge Edward M. Chen
28	Juage 2

Stipulation and Order for Limited Discovery

Page -2-